

Nathan Ochsner, Clerk of Court

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to this instrument are
prohibited by court order

THE GRAND JURY CHARGES THAT:

1. From in or about October 2021 through in or about February 2023, **AGAPITO JORGE VENTURA, TOMAS QUINO CANIL, ALBERTO MACARIO CHITIC, OSWALDO MANUEL ZAVALA QUINO, [REDACTED], and JOSEFA QUINO CANIL DE ZAVALA** conspired to bring undocumented aliens, including unaccompanied minors, across international borders, from countries including Guatemala to and through Mexico to the United States. These undocumented aliens did not possess authorization to enter the United States.
2. As part of the conspiracy, the defendants recruited Guatemalan migrants, collected payment, and arranged for their transportation to the United States.
3. During the course of the conspiracy, migrants were moved on foot, and inside microbuses, cattle trucks, and tractor trailers.

4. During the course of the conspiracy, co-conspirators communicated with one another from within Guatemala and the United States to facilitate migrants' journey to and throughout the United States.
5. During the course of the conspiracy, the defendants and their co-conspirators used Facebook Messenger to request and deliver identification documents relating to migrants who planned to be smuggled to the United States.
6. During the course of the conspiracy, Facebook Messenger was used to distribute written scripts that included instructions on what unaccompanied minors should say if or when they were apprehended by U.S. immigration authorities.
7. During the course of the conspiracy, specifically on December 9, 2021, migrants destined for the United States were loaded into a tractor trailer that later crashed near Tuxtla Gutierrez, Chiapas, Mexico, killing more than 50 people and causing serious bodily injuries to numerous others.

COUNT ONE

*(Conspiracy to Bring an Alien to the United States, Placing life in Jeopardy,
Causing Serious Bodily Injury, and Resulting in Death)*

Paragraphs 1 through 7 of this Indictment are realleged and incorporated as though fully set forth herein.

From in or about October 2021 to in or about February 2023, in the Southern District of Texas, the country of Guatemala, the country of Mexico, and elsewhere, and within the jurisdiction of the Court, Defendant(s),

**AGAPITO JORGE VENTURA
aka JORGE VENTURA; aka GEORGE VENTURA; aka EL RAITERO,**

TOMAS QUINO CANIL,

**ALBERTO MACARIO CHITIC,
aka ALBERTO DE JESUS,**

**OSWALDO MANUEL ZAVALA QUINO
aka OSWALDO ZQ,**

JOSEFA QUINO CANIL DE ZAVALA

did knowingly conspire and agree with each other and other persons known and unknown to the grand jurors, knowing that a person is an alien, to bring and attempt to bring to the United States in any manner whatsoever such person at a place other than a designated port of entry or place other than designated by the Commissioner, regardless of whether such an alien has received prior official authorization to come to, enter, and reside in the United States and regardless of any future official action which may be taken with respect to such alien, resulting in the death of at least one person. During and in relation to the above violation of law, the defendant(s) caused serious bodily injury to at least one person, and the defendant(s) caused the life of at least one person to be placed in jeopardy.

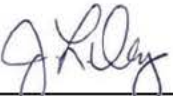
In violation of Title 8, United States Code, Section 1324(a)(1)(A)(i), 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(iii), and 1324(a)(1)(B)(iv).

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

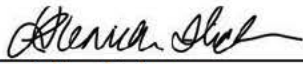
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ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



Jennifer L. Ray
Assistant United States Attorney

NICOLE M. ARGENTIERI
Principal Deputy Assistant Attorney General
Head of the Criminal Division
Department of Justice



Danielle Hickman
Trial Attorney
Department of Justice, Criminal Division
Human Rights and Special Prosecutions Section

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USA-74-24b
(Rev. 3-14-23)

CRIMINAL DOCKET

LAREDO DIVISION

NO: 5:24-CR-01187-S

FILE: MAG#:
INDICTMENT Filed: _____

Judge: MGM

ATTORNEYS:

UNITED STATES OF AMERICA

VS.

ALAMDAR S. HAMDANI, USA
JENNIFER L. DAY, AUSA
NICOLE M. ARGENTIERI, PRINCIPAL
DEPUTY AAG, HEAD OF CRIMINAL DIVISION
DANIELLE HICKMAN, TRIAL ATTORNEY

1) AGAPITO JORGE VENTURA

AKAs: JORGE VENTURA, GEORGE VENTURA, EL RAITERO

2) TOMAS QUINO CANIL

3) ALBERTO MACARIO CHITIC

AKA: ALBERTO DE JESUS

4) OSWALDO MANUEL ZAVALA QUINO

AKA: OSVALDO ZQ

6) JOSEFA QUINO CANIL DE ZAVALA

CHARGE:

Count 1: Conspiracy to Bring Undocumented Alien to United States, Placing Life in Jeopardy, Causing Serious Bodily Injuries, and Resulting in Death [8 USC 1324(a)(1)(A)(i), (v)(I), (a)(1)(B)(iii), and (a)(1)(B)(iv)]

TOTAL COUNTS: 1

PENALTY:

Count 1: Death, or Imprisonment for any term of years or for Life, and/or up to a \$250,000 fine, \$100 special assessment, \$5,000 special assessment, not more than a 5-year term of supervised release